



Mr A Blackwell

Our Ref: GEN/18/00515
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1 November 2018

Dear Mr Blackwell

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (SI571/2017) ('THE EIA REGULATIONS') SCREENING OPINION IN RESPECT OF LAND WEST OF THE CREMATORIUM, BARTONS ROAD, HAVANT

Site Address: Land west of The Crematorium, Bartons Road, Havant

Proposed Development: Development Consultation Forum (DCF) - Proposal for 81 new homes plus ancillary open space, including community orchard. The community orchard, open space and drainage details include land within East Hampshire District Council.

This screening opinion is with regard to a pre-application submission in relation to the above proposal and the potential development has been screened in accordance with the above regulations. It should be noted that this screening opinion relates to the currently submitted pre-application proposals and a further screening would be required if the residential development were to be increased or included housing within East Hampshire District.

It is noted that the overall development to which the proposal relates comprises:

- 81 New Homes
- Ancillary open space
- Community Orchard
- Drainage
- Overall site area is 6.284 Ha

The development comprises Schedule 2 development for which a screening opinion is required as it is an 'Infrastructure Project' comprising an 'urban development project' on land in excess of 5 ha in Schedule 2(10) of the Regulations.

The applicable thresholds and criteria in schedule 2 column 2 provides guidance in relation to likely impacts from development and these are considered below:

(i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or

Whilst the site comprises 6.284 ha of land it is noted that this is a residential development with open space and community orchard. It is not considered that this threshold is breached.

(ii) the development includes more than 150 dwellings; or

The development proposes 81 dwellings and this threshold is not breached.

(iii) the overall area of the development exceeds 5 hectares.

The overall site area exceeds 5 hectares and it is therefore considered appropriate to screen the development.

It is considered, having regard to the selection criteria in schedule 3 to the Regulations and the associated guidance including screening indicative criteria and thresholds, the development would not be likely to have significant effect on the environment by virtue of factors such as its nature, size or location.

As a result, it can be confirmed that the development described in your planning pre-application, associated plans and documents is not EIA development.

Statement of Reasons:

- The site does not lie within an environmentally sensitive area.
- The built area of the scheme is less than 5 ha.
- The development would not result in development of more than 150 dwellings
- The characteristics of the development result in the retention of significant areas of undeveloped land with residential development concentrated along the southern site frontage.
- The impact on water resources, flood risk and pollution can be managed through the planning application process.
- Whilst this is a development on agricultural land the area of housing development is relatively limited (approximately 2.55ha).
- The site itself is not considered to include specific characteristics that would mitigate against development in principle in ecological terms.
- Potential impacts in relation to adjacent Ancient Woodland and Site of Nature Conservation Interest can be considered, managed and mitigated through the planning application process.
- The impact of the proposed development on protected species can be effectively reduced through the planning application process through appropriate avoidance and mitigation measures being secured.

Finally during the consideration of the pre-application Natural England and the Hampshire County Council Ecologist provided the following consultation responses which should inform and guide the form of any formal planning application:

NATURAL ENGLAND

Bird Aware Solent I SRMP Contributions

This application is within 5.6km of the Chichester and Langstone Harbours Special Protection Area (SPA) and will lead to a net increase in residential accommodation. Any forthcoming planning application will need to comply with adopted planning policy to mitigate against adverse effects from recreational disturbance on the Solent SPA sites, as agreed by the Solent Recreation Mitigation Partnership (SRMP) Definitive Strategy.

Biodiversity and Protected Species

Natural England recommends that the application is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP) that has been agreed by a Hampshire County Council (HCC) Ecologist. This will ensure the proposal meets the requirements of the standing advice and the additional requirements for biodiversity enhancement as set out in National Planning Policy Framework paragraphs 7, 109 and 118.

The scope of the BMEP should be agreed with the HCC Ecologist and should consider great crested newts, reptiles, bats (roosting and foraging), hazel dormice, and nesting birds. Consideration will also need to be given to the adjacent ancient woodland, which is designated as a Site of Importance for Nature Conservation. An appropriate planted buffer between the woodland and any new development will be required and a consideration of the potential impacts arising from recreational disturbance. Natural England would like to draw your attention to the proximity of the site to the ancient Forest of Bere landscape where the Bechstein's bat species is found in internationally important numbers. The species is listed as a Priority Species under the UK Biodiversity Action Plan (BAP).

Policy E 18 of the Draft Havant Local Plan sets out the following advice:

'For sites that contain or are adjacent to sites likely to contain Bechstein's bat, planning permission will only be granted where:

- *Survey methods appropriate to Bechstein's bat are used and undertaken by a suitably-qualified ecologist.*

If the presence of Bechstein's bat is established, planning permission would only be granted where:

- *The net loss of woodland (including groups of trees) is avoided;*
- *Impacts on Bechstein's bat breeding habitat (i.e. net loss of/excessive disturbance to woodland or trees containing maternity roosts) are avoided;*
- *Proposals include appropriate buffers to woodlands, hedgerows and other flight corridors, taking into account the location of roosts and foraging/commuting habitats; and*
- *Review and monitoring plans are put in place, where appropriate.'*

In line with the 'avoid, mitigate, compensate' hierarchy, Natural England recommends that potential impacts are avoided in the first instance, for example through the design of the scheme, such as location of built development, access restrictions, sensitive lighting strategy. Where avoidance is not possible, the BMEP should include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual biodiversity losses that cannot be fully mitigated on site. This might include the provision of offsite replacement habitats, or an agreed financial contribution for biodiversity enhancements elsewhere calculated using a Biodiversity Compensation Framework, Environment Bank, or similar mechanism.

The BMEP should also include measures to benefit wildlife such as planting native trees including fruit trees within gardens, native hedges, new wildlife ponds and the provision and bird (eg house martin, swift) and bat boxes of a design that is incorporated into the fabric the new buildings.

Opportunities for enhancement might include:

- *Restoring a neglected hedgerow.*
- *Creating a new pond as an attractive feature on the site.*
- *Planting trees characteristic to the local area to make a positive contribution to the local landscape.*
- *Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.*
- *Incorporating bat boxes into the design of new buildings.*
- *Designing lighting to encourage wildlife.*
- *Adding a green roof to new buildings.*

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- *Links to existing greenspace and/or opportunities to enhance and improve access.*
- *Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)*
- *Planting additional street trees.*
- *Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).*

Natural England expects any forthcoming application to set out how biodiversity net gain will be achieved, over and above residual losses which should be accounted for and addressed. We recommend the applicants make use of the Defra biodiversity metric, which is a clear and methodical calculation for net gain in biodiversity for individual planning proposals.

Green Infrastructure

The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such, Natural England would encourage the incorporation of GI into this development. Multi-functional green infrastructure can perform a range of functions such as improving the attractiveness of the future dwellings for new residents, flood risk management, provision of accessible green space, climate change adaptation, biodiversity enhancement and supporting and enhancing the wider ecological network. Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England Green Infrastructure web pages.

Water Resources

Natural England encourages all new development to adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres /head/day including external water use) and re-use in line with best practice. Consideration should be given to the use of grey water recycling systems and efficient appliances

Protected Landscapes

The proposed development is near to a nationally designated landscape namely South Downs National Park. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

Your decision should be guided by paragraph 115 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 116 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

The landscape advisor/planner for the National Park will be best placed to provide you with detailed advice about this development proposal. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the park's management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purposes of the National Park are to conserve and enhance the natural beauty, wildlife and cultural heritage of the park; and to promote opportunities for the understanding and enjoyment of the special qualities of the park by the public. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm those statutory purposes. Relevant to this is the duty on public bodies to 'have regard' for those statutory purposes in carrying out their functions (section 11 A(2) of the National Parks and Access to the Countryside Act 1949 (as amended)). The Planning Practice Guidance confirms that this duty also applies to proposals outside the designated area but impacting on its natural beauty.

Best and Most Versatile Agricultural Land and Soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England's Technical Information Note 049.

Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

COUNTY ECOLOGY (HAMPSHIRE COUNTY ECOLOGIST)

The application is accompanied by a Phase 1 Habitat Survey (The Ecology Co-op, December 2017). The site is predominantly arable land with associated grassland margins and boundary hedgerows and is immediately adjacent to a semi-natural ancient woodland SINC.

There is a very high likelihood of Bechstein's bat occurring at this site: the species has been recorded within Barton's Copse SINC and occurs in the surrounding landscape in good numbers. There is high potential for the species to roost within trees on/adjacent to the site and to forage/commute within the site. The presence of this species can only reliably be determined by specific survey methods.

Otherwise, the site has potential to support a variety of protected/notable species and a range of surveys have been recommended: hopefully these have been carried out since December 2017.

Following submission of any future ecological assessments, there will need to be a fully-detailed ecological mitigation, compensation and enhancement strategy, demonstrating how the proposed development will avoid, mitigate and compensate any ecological impacts.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Simon Jenkins', with a horizontal line underneath the name.

Simon Jenkins
Head of Planning - Havant Borough and East Hampshire District Councils